

## **REMARKS**

### **Common Ownership**

The present application and U.S. Patent 6,584,539 to James et al. were both owned by, or subject to an assignment to, Sony Corporation at the time the invention of the present application was made.

### **Rejections**

#### ***Rejections under 35 U.S.C. § 102(e)***

#### **Claims 1-20**

Claims 1-20 stand rejected under 35 U.S.C. § 102(e) over James. Applicant does not admit that James is prior art and reserves the right to swear behind the reference at a later date. Nonetheless, Applicant respectfully submits that Applicant's invention as claimed in claims 1-20 is not anticipated by James.

James discloses a next-neighbor ordering bus topology. A node passes messages it receives to its "next-neighbor" node, i.e., its topological adjacent node. Each node is defined within the topology using a relative ring identifier (ringID) based on self identification (selfID) packets sent by the nodes during a self identification process. Each node also maps its selfID to a ringID, and uses the ringID to communicate with its next-neighbor node. The ringID is composed of the bus identification (busID) and physical identification (phyID) of the node.

The Examiner appears to be equating the selfID and ringID disclosed in James with Applicant's claimed node identifier (nodeID) and extended unique identifier (EUI). While the ringID and a nodeID may be considered equivalent because both are based on the busID and phyID of a node, James does not teach or suggest that the selfID is equivalent to the claimed EUI. Indeed, as well known in the art, during the self identification process for an IEEE 1394 bus, each node selects the next available nodeID as its selfID. Therefore, James does not teach each and every limitation of claims 1-20.

With regard to independent claims 1, 13 and 18, the Examiner further relies on James as disclosing Applicant's claimed address resolution protocol that uses the EUI to find an updated nodeID after a change indication is received. Although James discloses that each node on the topology may append its EUI to messages that traverse the

topology, James does not teach or suggest the address resolution protocol for the next-neighbor ordering topology uses the appended EUIs to find updated nodeIDs.

With regard to independent claims 7, 11, 16, 17, 19 and 20, the Examiner further relies on James as disclosing Applicant's claimed searching of the memory of a listener node for the EUI of a controller node, and Applicant's claimed comparing of EUIs. In addition to the phyIDs, selfIDs and ringIDs as described above, James discloses that each node has a virtual ID address. However, there is no teaching or suggestion in James that the virtual ID is equivalent to Applicant's claimed EUI. Furthermore, James does not disclose that the memory of a listener node is searched for any EUI or that any EUIs are compared. Finally, the Examiner is relying on the processing of broadcast message as disclosed in James to anticipate Applicant's claimed replacing of the EUI stored in the listener's memory with a different EUI. James discloses that information in the appended message may be stored in the talker node (portal) that initiated the broadcast message, but neither teaches or suggests replacing EUIs within the memory of a listener node.

Accordingly, Applicant respectfully submits that the invention claimed in claims 1-20 is not anticipated by James under 35 U.S.C. § 102(e) and respectfully requests the withdrawal of the rejection of the claims.

### **SUMMARY**

Claims 1-20 are currently pending. In view of the foregoing amendments and remarks, Applicant respectfully submits that the pending claims are in condition for allowance. Applicant respectfully requests reconsideration of the application and allowance of the pending claims.

If the Examiner determines the prompt allowance of these claims could be facilitated by a telephone conference, the Examiner is invited to contact Sue Holloway at (408) 720-3476.

**Deposit Account Authorization**

Authorization is hereby given to charge our Deposit Account No. 02-2666 for any charges that may be due. Furthermore, if an extension is required, then Applicant hereby requests such extension.



Dated: AUG 3, 2004

Respectfully submitted,

BLAKELY, SOKOLOFF, TAYLOR  
& ZAFMAN LLP

  
Sheryl S. Holloway  
Attorney for Applicant  
Registration No. 37,850

12400 Wilshire Boulevard  
Seventh Floor  
Los Angeles, CA 90025-1026  
(408) 720-347

**RECEIVED**

AUG 11 2004

Technology Center 2100